

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

CODE-TO-LEARN FOUNDATION D/B/A
SCRATCH FOUNDATION,

Plaintiff,

v.

SCRATCH.ORG, an Internet domain name,

Defendant.

Civil Action No. 1:19-cv-67-LO-MSN

**PLAINTIFF’S SECOND MOTION TO COMPEL AND MOTION TO
DE-DESIGNATE DISCOVERY MATERIAL**

Plaintiff Code-To-Learn Foundation d/b/a Scratch Foundation (“Plaintiff”), by counsel, moves for an order compelling Defendant to re-produce a full and complete list of domain names currently or previously owned by the owner of the Scratch.org domain name without a “Confidential” or “Outside Counsel’s Eyes Only” designation. In support of this motion, Plaintiff relies on the memorandum and exhibits filed concurrently herewith.

Dated: September 20, 2019

By: /s/ Attison L. Barnes, III /s/
Attison L. Barnes, III (VA Bar No. 30458)
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d/b/a Scratch Foundation*

CERTIFICATE OF SERVICE

I, Attison L. Barnes, III, hereby certify that on September 20, 2019, I electronically served the foregoing on all counsel of record via the Court's CM/ECF system.

/s/ Attison L. Barnes, III /s/

Attison L. Barnes, III

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